

Charles N. Guthrie # 76644
Attorney at Law
121 Broadway, Suite 531
San Diego, California 92101
Tel. (619) 230-8598

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
HON. DANA M. SABRAW

21 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND HER DESIGNATED
22 ASSISTANT AUSA, ANDREW SCHOPLER.

MOTION

25 Defendant, Rodolfo Veta, Jr., is set for sentencing on February 14, 2008, at 9:00 a.m.,
26 before the Honorable Judge Dana M. Sabraw and this motion moves the court to shorten time for
27 the filings of his sentence motions no later than March 13, 2008.

|||||

DECLARATION IN SUPPORT OF ORDER

My name is Charles N. Guthrie and I am the court appointed CJA attorney for Rodolfo Veta, Jr. I have been involved in a complicated jury trial as well as advising a Material Witness in a homicide case within the last two weeks. Sentence motions were filed in Mr. Veta, Jr.'s case; however upon review they had to withdrawn because the motions were asking for more than the plea agreement allowed.

I believe the late Sentence Memorandum, Summary Chart, and Motion Downward Adjustment for Minor Role with Points and Authorities will not prejudice the prosecution in that no new issues are raised.

I declare/ certify the above true under penalty of perjury executed this March 13, 2008, in
the City of San Diego, State of California.

S/ Charles N. Guthrie
Charles N. Guthrie

ARGUMENT

The proposed sentence memorandum and sentence summary chart, Motion for Downward Adjustment Minor role and Points and Authorities contain no new or novel issues and will not prejudice the prosecution.

The court is respectfully moved to allow defendant file his sentence motions no later than Thursday, March 13, 2008.

Respectfully submitted,

March 13, 2008

1700-1800-1900-2000

s/Charles N. Guthrie
Charles N. Guthrie, Atty at Law